

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.: _____
v.	:	DATE FILED: _____
DONNA MCCONNELL a/k/a "Donna Morris"	:	Violations: 18 U.S.C. § 495 (Forging a Treasury check - 1 count) 18 U.S.C. § 1341 (Mail fraud - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Between on or about September 26, 1994 and on or about May 3, 2001, at Aston, Pennsylvania, defendant DONNA MCCONNELL, a/k/a "Donna Morris," forged her mother, Theresa Morris', name on approximately \$65,700.70 worth of Treasury checks payable to Theresa Morris, who died September 26, 1994.

2. On or about April 3, 2001, at Aston, Pennsylvania, in the Eastern District of Pennsylvania, defendant

DONNA MCCONNELL,
a/k/a "Donna Morris,"

knowingly, and with intent to defraud, forged the signature of her mother, Theresa Morris, without the permission of her mother, who was dead, on a Treasury check of the United States,

for the purpose of obtaining and receiving a sum of money from the United States, that is,
\$843.00.

In violation of Title 18, United States Code, Section 495.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. From on or about September 26, 1994 through on or about January 22, 2002,
defendant

DONNA MCCONNELL,
a/k/a "Donna Morris,"

devised and intended to devise a scheme to defraud a corporation, and to obtain money and property from a corporation by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

It was part of the scheme that:

2. DONNA MCCONNELL wished to continue receiving pension benefits from a certain corporation (the "Victim"), known to the grand jury, after her mother, Theresa Morris, died. DONNA MCCONNELL was not entitled to receive these benefits.

3. DONNA MCCONNELL's mother, Theresa Morris, was entitled to receive pension benefits because Robert Morris, Theresa Morris' husband, was a long time employee of the Victim. Robert Morris died in approximately September of 1984.

4. DONNA MCCONNELL, although she knew her mother had died, never advised the Victim of her mother's death. Instead, she continued to receive and use a total of approximately \$17,149.44 in pension benefits, which were deposited in a bank account controlled by Theresa Morris.

5. In a letter to the benefits coordinator for the Victim dated April 30, 1998,

DONNA MCCONNELL posed as Theresa Morris and requested that the pension benefits be deposited to a new account, opened after Theresa Morris died, located in Aston, Pennsylvania.

6. On January 22, 2002, when asked by a representative of the Victim whether she, pretending to be her mother, had ever requested by telephone or letter that the Victim change the direct deposit of pension benefits to a new account, DONNA MCCONNELL replied "I never claimed to be her." This was false, and DONNA MCCONNELL knew it was false at the time she made the statement.

THE MAILING

5. On or about April 30, 1998, at Aston, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, having devised and intending to devise the scheme to defraud, defendant DONNA MCCONNELL, a/k/a "Donna Morris," for the purpose of executing the scheme and attempting to do so, knowingly caused to be delivered by mail to the benefits coordinator for the Victim, according to the direction thereon a certain letter, posing as her deceased mother, requesting that pension benefits payable to her deceased mother be forwarded to a new bank account.

All in violation of Title 18, United States Code, Section 1341.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney